

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Terrorist Attacks on September 11, 2001 ) 03 MDL 1570 (GBD)

) ECF Case

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This document relates to:

*Burnett v. Arab Bank, PLC, 03-cv-9849*

**DUBAI ISLAMIC BANK'S ANSWER TO PLAINTIFFS' COMPLAINT<sup>1</sup>**

**INTRODUCTION**

The averments in the "Introduction" do not comply with the requirements of Federal Rule 10(b), and therefore do not require a response. To the extent these averments are deemed to require a response, DIB is without knowledge or information sufficient to form a belief about the truth of the averments, and therefore they are denied.

**JURISDICTION AND VENUE**

1. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
2. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
3. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.

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<sup>1</sup> Each numbered paragraph in this answer corresponds with and responds to the paragraph in the *Burnett v. Al Baraka Investment & Devel. Corp.* Complaint bearing the same number.

## **PARTIES**

### **PLAINTIFFS**

4. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

### **FACTUAL ALLEGATIONS AGAINST DEFENDANTS**

#### **BACKGROUND**

5. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
6. DIB admits only that Osama bin Laden and al Qaeda have claimed responsibility for the September 11 attacks. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
7. DIB admits only that on September 11, 2001, an airplane crashed into the North Tower of the World Trade Center in New York. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
8. DIB admits only that on September 11, 2001, an airplane crashed into the South Tower, or Tower Two, of the World Trade Center in New York. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
9. DIB admits only that on September 11, 2001, an airplane crashed into the Pentagon in Arlington, Virginia. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
10. DIB admits only that on September 11, 2001, an airplane crashed in Shanksville, Pennsylvania. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
11. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.

12. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
13. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
14. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
15. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
16. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
17. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**The Hamburg al Qaeda Cell**

18. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
19. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
20. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
21. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
22. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
23. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
24. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
25. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
26. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

27. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
28. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
29. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
30. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
31. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
32. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
33. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
34. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
35. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
36. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
37. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
38. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
39. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**The Banking Defendants**  
**The Islamic Banking System and its Role in International Terrorism**

40. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

41. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
42. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
43. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
44. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
45. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
46. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

**Al Baraka Investment and Development Corporation**

47. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
48. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
49. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
50. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
51. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

52. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
53. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
54. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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66. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Al Shamal Islamic Bank**

67. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
68. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

69. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
70. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
71. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
72. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
73. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
74. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
75. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
76. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
77. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

78. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
79. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
80. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
81. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
82. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
83. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Al-Rajhi Banking and Investment Corporation**

84. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
85. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

86. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
87. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**National Commercial Bank**

88. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
89. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
90. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
91. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
92. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
93. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
94. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

95. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
96. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Dar al Maal al Islami**

97. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
98. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
99. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Faisal Islamic Bank – Sudan**

100. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
101. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
102. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Al Barakaat Exchange LLC**

103. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
104. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
105. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
106. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Tadamon Islamic Bank**

107. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
108. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
109. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
110. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Dubai Islamic Bank**

111. DIB admits only that it is headquartered in the United Arab Emirates (or “UAE”) and was created in 1975. DIB denies that it is chaired by Mohamed Khalfan bin Kharbasha and that it is shareholder of Baraka Islamic Bank EC. DIB is without knowledge or information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.
112. DIB admits only that it was the victim of a fraud scheme involving Foutanga (Babani) Sissoko. DIB denies the remaining allegations.
113. DIB is without knowledge or information sufficient to form a belief about the announcements of the United States Government in 1999 concerning laundering of money for Osama bin Laden, and therefore those allegations are denied. DIB is without knowledge or information sufficient to form a belief about whether on July 8, 1999, a spokesman for the United States State Department stated that the government of the United Arab Emirates reported that they have taken steps to clean up the Dubai Islamic Bank and to restore its reputation, and therefore those allegations are denied. DIB is without knowledge or information sufficient to form a belief about whether the States Department spokesman admitted that his comment implied that wrongdoing had been occurring at the Dubai Islamic Bank, and therefore those allegations are denied. DIB denies the remaining allegations.
114. DIB is without knowledge or information sufficient to form a belief about these allegations, and therefore these allegations are denied.
115. To the extent that the allegations in this paragraph purport to characterize the contents of a document; that document speaks for itself and therefore no response is required. To the extent these allegations are deemed to require a response, they are denied. DIB denies the remaining allegations.
116. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore the allegations are denied.
117. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore the allegations are denied.
118. DIB is without knowledge or information sufficient to form a belief as to the truth of the allegations related to accounts at Standard Chartered Bank, and therefore those allegations are denied. DIB denies the remainder of the allegations.

119. To the extent that this paragraph alleges that Mustafa Ahmed al-Hisawi held accounts at Dubai Islamic Bank, the allegations are denied. DIB is without knowledge or information sufficient to form a belief about the truth of the remainder of these allegations, and therefore these allegations are denied.
120. To the extent that this paragraph alleges that Mustafa Ahmed al-Hisawi held accounts at Dubai Islamic Bank, the allegations are denied. DIB is without knowledge or information sufficient to form a belief about the truth of the remainder of these allegations, and therefore these allegations are denied.
121. DIB is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore the allegations are denied.
122. DIB denies that on September 27, 2001 the Central Bank of the United Arab Emirates announced that it had ordered the freezing of accounts and investments of twenty-six persons or organizations at the Dubai Islamic Bank. DIB is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and therefore those allegations are denied.
123. DIB is without knowledge or information sufficient to form a belief about the truth of the allegations that on September 25, 2001, Luxembourg's commission for supervising financial institutions, issued a regulatory alert naming DIB as having links with Osama bin Laden and terrorism, and therefore those allegations are denied. To the extent the allegations purport to characterize the contents of a document; that document speaks for itself and therefore no response is required. To the extent these allegations are deemed to require a response, they are denied. DIB denies the remaining allegations.

**Bank al-Taqwa Limited**

124. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
125. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
126. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

127. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
128. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
129. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
130. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
131. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
132. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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135. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

136. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
137. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Arab Bank, PLC**

138. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
139. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Saudi American Bank**

140. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
141. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

- 144. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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- 147. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 148. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 149. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

## **THE CHARITY DEFENDANTS**

### **The Charity Fronts of Terror**

- 150. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 151. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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153. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Al-Haramain Islamic Foundation, Inc.**

154. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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**Al-Haramain's Humanitarian Efforts Used to Conceal Support for al Qaeda**

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#### **Al-Haramain's Ties to al Qaeda's 1998 United States Embassy Bombings**

- 167. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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**Al Haramain role in funding international terrorism is ongoing  
and demonstrates a pattern of conduct**

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**Benevolence International Foundation Inc.**

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**World Assembly of Muslim Youth**

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**International Islamic Relief Organization**

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**The Muslim World League**

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**The SAAR Foundation**

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**Rabita Trust**

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**The Global Relief Foundation**

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**Taibah International Aid Association**

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#### **Saudi Binladin Group**

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**Yassin Abdullah al-Kadi and Muwaffaq**

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**Certain Members of the Saudi Royal Family, and Related Persons**

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**Delta Oil Company**

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#### **NIMIR LLC**

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**Ary Gold LTD**

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**The Republic of Sudan**

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**The Agencies and Instrumentalities of the Republic of Sudan**

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**The Saudi – Spanish – German al Qaeda Scheme**

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**Abu Qatada al-Filistini**

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**Mohammed Hussein al-Amoudi**

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**Yassir al-Sirri**

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- 556. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 557. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 558. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 559. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 560. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**The Advice and Reformation Committee (ARC) and  
The Committee for the Defense of Legitimate Rights (CDLR)**

- 561. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 562. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 563. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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569. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
570. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
571. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

572. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
573. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

- 581. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 582. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 583. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 584. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 585. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Islamic Cultural Center of Milan/Islamic Cultural Center of Geneva**

- 586. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 587. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
- 588. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

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611. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
612. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Mercy International Relief Agency**

613. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
614. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations,

and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

615. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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618. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
619. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
620. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
621. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
622. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

623. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Laundering of al Qaeda Funds Through Diamond Businesses**

624. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
625. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
626. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
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628. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
629. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
630. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**Additional Defendants**

631. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
632. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
633. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
634. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

**CLAIMS**

**COUNT ONE**

**FOREIGN SOVEREIGN IMMUNITIES ACT**

635. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
636. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
637. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
638. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

639. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
640. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegation

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Foreign Sovereign Immunities Act cause of action is not asserted against DIB.

## COUNT TWO

### TORTURE VICTIM PROTECTION ACT

641. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
642. No response is required from DIB to the allegations in this paragraph because the Torture Victim Protection Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
643. No response is required from DIB to the allegations in this paragraph because the Torture Victim Protection Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
644. No response is required from DIB to the allegations in this paragraph because the Torture Victim Protection Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Torture Victim Protection Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

### COUNT THREE

#### **18 U.S.C. § 2331 (2331 et. seq.) et. seq.**

- 645. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
- 646. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 647. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 648. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
- 649. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 650. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 651. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

652. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause appears to relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

#### **COUNT FOUR**

##### **ALIEN TORT CLAIMS ACT**

653. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
654. No response is required from DIB to the allegations in this paragraph because the Alien Tort Claims Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
655. No response is required from DIB to the allegations in this paragraph because the Alien Tort Claims Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
656. No response is required from DIB to the allegations in this paragraph because the Alien Tort Claims Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
657. No response is required from DIB to the allegations in this paragraph because the Alien Tort Claims Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to

DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Alien Tort Claims Act cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

## **COUNT FIVE**

### **WRONGFUL DEATH**

- 658. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
- 659. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 660. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
- 661. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 662. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 663. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
- 664. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or

information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause appears to relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

**COUNT SIX**

**NEGLIGENCE**

665. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
666. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
667. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause appears to relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

**COUNT SEVEN**

**SURVIVAL**

668. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
669. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
670. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause appears to relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

## COUNT EIGHT

### NEGLIGENT AND/OR INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

671. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
672. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
673. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
674. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
675. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
676. To the extent that these allegations relate to DIB, DIB denies these allegations. To the extent these allegations relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied

DIB denies that Plaintiffs are entitled to recover from DIB any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause appears to relate to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

**COUNT NINE**

**CONSPIRACY**

677. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
678. No response is required from DIB to the allegations in this paragraph because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
679. No response is required from DIB to the allegations in this paragraph because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
680. No response is required from DIB to the allegations in this paragraph because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
681. No response is required from DIB to the allegations in this paragraph because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
682. No response is required from DIB to the allegations in this paragraph because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and

Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Conspiracy cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

#### **COUNT TEN**

##### **AIDING AND ABETTING**

- 683. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
- 684. No response is required from DIB to the allegations in this paragraph because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
- 685. No response is required from DIB to the allegations in this paragraph because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
- 686. No response is required from DIB to the allegations in this paragraph because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

687. No response is required from DIB to the allegations in this paragraph because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
688. No response is required from DIB to the allegations in this paragraph because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Aiding and Abetting cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

## **COUNT ELEVEN**

### **VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(a)**

689. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
690. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
691. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum

Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

692. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
693. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
694. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
695. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
696. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to

DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

697. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
698. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the 18 U.S.C. § 1962(a) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

## **COUNT TWELVE**

### **VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(c)**

699. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
700. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum

Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

701. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
702. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
703. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
704. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
705. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to

DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

706. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the 18 U.S.C. § 1962(c) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

### **COUNT THIRTEEN**

#### **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(d)**

707. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
708. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
709. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum

Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

710. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
711. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
712. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
713. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
714. No response is required from DIB to the allegations in this paragraph because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to

DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the 18 U.S.C. § 1962(d) cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

#### **COUNT FOURTEEN**

##### **PUNITIVE DAMAGES**

715. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
716. No response is required from DIB to the allegations in this paragraph because the Punitive Damages cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.
717. No response is required from DIB to the allegations in this paragraph because the Punitive Damages cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent these allegations are deemed to require a response, DIB denies these allegations to the extent that they relate to DIB, and DIB is without knowledge or information sufficient to form a belief about the truth of the allegations to the extent these allegations relate to defendants other than DIB and therefore those allegations are denied.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because the Punitive Damages cause of action against DIB was dismissed by the Memorandum Decision and Order of the Court dated June 17, 2010. To the extent that a response is required, DIB denies that Plaintiffs are entitled to recover the relief requested against DIB. To the extent the WHEREFORE clause relates to defendants other than DIB, DIB is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

**COUNT FIFTEEN**

**PUNITIVE DAMAGES – AGENCIES AND INSTRUMENTALITIES  
OF THE FOREIGN STATE DEFENDANT**

718. DIB hereby incorporates its responses to the previous allegations as if fully set forth herein.
719. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
720. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
721. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.
722. These allegations appear to relate to defendants other than DIB; DIB is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied. To the extent that these allegations relate to DIB, DIB denies these allegations.

No response is required from DIB to the allegations in Plaintiffs' WHEREFORE clause because this cause of action is not asserted against DIB.

**Common Issues Requiring Consolidation**

723. No response is required from DIB as this paragraph contains no factual allegations.
724. Each and every allegation in Plaintiff's Complaint that has not been specifically admitted is hereby denied.

**JURY DEMAND**

Plaintiffs' statement with respect to a jury trial contains no allegations to which a response is required.

## **AFFIRMATIVE DEFENSES**

### **First Affirmative Defense**

1. Plaintiffs fail to state a claim for which relief can be granted.

### **Second Affirmative Defense**

2. This Court does not have personal jurisdiction over Plaintiffs' claims against DIB.

### **Third Affirmative Defense**

3. This Court does not have subject matter jurisdiction over Plaintiffs' claims against DIB.

### **Fourth Affirmative Defense**

4. There is no causal connection between any of DIB's activities and Plaintiffs' asserted injuries.

### **Fifth Affirmative Defense**

5. No act or omission of any agent, servant, or employee of DIB proximately caused any harm or damages to Plaintiffs.

### **Sixth Affirmative Defense**

6. Plaintiffs fail to adequately allege scienter.

### **Seventh Affirmative Defense**

7. Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

### **Eighth Affirmative Defense**

8. DIB is not liable for Plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, see, e.g., N.Y. C.P.L.R. § 1601 et seq.

### **Ninth Affirmative Defense**

9. This Court is not the proper venue for Plaintiffs' claims against DIB.

### **Tenth Affirmative Defense**

10. Plaintiffs have waived their claims based on the doctrine disallowing double-recovery.

### **Eleventh Affirmative Defense**

11. Plaintiffs have waived their claims based on the collateral source doctrine.

**Twelfth Affirmative Defense**

12. Plaintiffs have waived their claims based on the doctrine of equitable subrogation.

**Thirteenth Affirmative Defense**

13. Plaintiffs have waived their claims based on the doctrine of subrogation.

**Fourteenth Affirmative Defense**

14. Plaintiffs have waived their claims against DIB.

**Fifteenth Affirmative Defense**

15. Plaintiffs' claims have been waived to the extent that certain Plaintiffs are seeking recovery against DIB for the same or similar claims in other civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001, 03 MDL 1570* (RCC), pending in the United States District Court for the Southern District of New York.

**Sixteenth Affirmative Defense**

16. Plaintiffs' state-law claims are pre-empted by federal law.

**Seventeenth Affirmative Defense**

17. Plaintiffs' claims are barred by the Act of State doctrine.

**Eighteenth Affirmative Defense**

18. Plaintiffs' claims are barred based on principles of International Comity.

**Nineteenth Affirmative Defense**

19. Plaintiffs' claims are barred based on Sovereign Immunity.

**Twentieth Affirmative Defense**

20. Plaintiffs' claims are barred by Political Question doctrine.

**Twenty-first Affirmative Defense**

21. Plaintiffs' claims are barred based on principles of Immunity.

**Twenty-second Affirmative Defense**

22. Plaintiffs' claims are barred by the doctrine of laches.

**Twenty-third Affirmative Defense**

23. Plaintiffs' claims have been discharged in bankruptcy.

**Twenty-fourth Affirmative Defense**

24. Plaintiffs' claims are barred by the doctrine of election of remedies.

**Twenty-fifth Affirmative Defense**

25. Plaintiffs have released their claims against DIB.

**Twenty-sixth Affirmative Defense**

26. Plaintiffs have discharged their claims against DIB.

**Twenty-seventh Affirmative Defense**

27. Plaintiffs' claims are barred by the doctrine of compromise and settlement.

**Twenty-eighth Affirmative Defense**

28. Plaintiffs are precluded from asserting their claims by the doctrine of res judicata.

**Twenty-ninth Affirmative Defense**

29. Plaintiffs are precluded from asserting their claims by the doctrine of collateral estoppel.

**Thirtieth Affirmative Defense**

30. Plaintiffs lack standing to pursue their claims against DIB.

**Thirty-first Affirmative Defense**

31. Plaintiffs' claims are barred by the statute of limitations.

**Thirty-second Affirmative Defense**

32. Plaintiffs are estopped from receiving the relief requested against DIB.

**Thirty-third Affirmative Defense**

33. Plaintiffs' claims are invalid in light of workers' compensation laws, regulations, rules, and case law.

**Thirty-fourth Affirmative Defense**

34. Plaintiffs' claims are barred to the extent that they violate DIB's right to Due Process.

**Thirty-fifth Affirmative Defense**

35. Plaintiffs' claims for punitive damages against DIB are invalid because DIB's activities, as alleged by Plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of DIB's activities in any way were intended to, or did harm, the Plaintiffs in this action.

**Thirty-sixth Affirmative Defense**

36. In response to Plaintiffs' claims, DIB intends to invoke all other defenses, including affirmative defenses, that become apparent in the future (including through discovery), and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses at a later point in time.

DATED: September 7, 2010

Respectfully submitted,

/s/ Robert G. Houck

Robert G. Houck

Juan P. Morillo (admitted *pro hac vice*)

Steven T. Cottreau (admitted *pro hac vice*)

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